



Via First Class and Electronic Mail

July 6, 2021

Program Administrator
DNREC – Division of Air Quality
100 West Water Street, Suite 6A
Dover, DE 19904

**Re: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook Industrial Complex
Title V Permit AQM-003/00021
Semi-Annual Deviation Report – 1st Half 2021**

Dear Program Administrator,

Pursuant to DNREC Title V Permit, AQM-003/00021, please find attached one (1) original and one (1) copy of the SPMT Semi-Annual Deviation Report for the period from January 1, 2021 through June 30, 2021.

Please feel free to call me at (610) 859-1279 if you have any questions.

Sincerely,


Kevin W. Smith
Specialist – Environmental Compliance

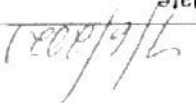
Cc: Brad Kloiz
State Street Commons
DNREC – Division of Air Quality
100 West Water Street, Suite 6A
Dover, DE 19904

U.S. Environmental Protection Agency Region III
Office of Air Enforcement and Compliance Assistance
(3AP20)
1650 Arch Street
Philadelphia, PA 19103

Certification Statement

"I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate and complete."


Edward Human
Senior Director – Marcus Hook Operations
Sunoco Partners Marketing & Terminals L.P.


Date

7 DE Admin. Code 1130 (Title V) State Operating Permit Program Division of Air Quality		AGM-1001DD	
SEMI-ANNUAL REPORT			
FOR DEPARTMENT USE, ONLY		DATE RECEIVED: DATE REVIEWED: REVIEWED BY:	

The Company shall submit to the Department and EPA Region III a report of any required monitoring and a report of any deviation(s) from permit requirements. This report shall be submitted no later than August 1 (covering the period from January 1 through June 30) and February 1 (covering the period from July 1 through December 31) of each calendar year. [Reference 7 DE Admin. Code 1130 (Title V) State Operating Permit Condition 3.3.2 and 7 DE Admin. Code 1130 Sections 6.1.3.3.1, 6.1.3.3.2, and 6.1.3.3.4 dated 12/11/00] Refer to the Instructions for Completing Semi-Annual Reports and Form AQM-1001DD dated July 27, 2001 and revised November 22, 2004 for questions concerning the use of this form.

Part A FACILITY INFORMATION

1. Facility Name: Sunoco Partners Marketing & Terminals L.P. - Marcus Hook Industrial Complex	
2. Facility Street Address: 100 Green Street	
3. City: Marcus Hook	4. State: PA
5. Zip Code: 19061	6. Permit No.: AQM-003/00021
7. Facility ID No.: 1003000021 (9 digits)	8. Date Permit Issued: 01/20/2021
9. What is the Reporting Period? 01/01/2021 TO 06/30/2021	
10. Date Form Prepared: 07/06/2021	
11. Technical Contact: Kevin Smith Title: Environmental Specialist	
Phone Number: 610-859-1279 Fax Number: E-Mail Address: kevin.smith2@energytransfer.com	
12. Has any of the information contained in Items 1 through 5 of Part A and/or Part E, Responsible Official, changed from that in the issued 7 DE Admin. Code 1130 Operating Permit? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
If YES, submit a request for an Administrative Permit Amendment per the requirements of 7 DE Admin. Code 1130 Section 7.3	

Part B REPORT OF ANY REQUIRED MONITORING

1. Are you submitting an Initial Report of Monitoring? If YES, complete Table 1 - Report of Any Required Monitoring. If NO, go to Question No. 2.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Are you submitting a Revised Report of Monitoring? If YES, complete Table 1 - Report of Any Required Monitoring. If NO, complete Part C, Part D, if applicable; Part E, and Part F. Reference 7 DE Admin. Code 1130 Section 6.1.3.3.1 dated 12/11/00 and the 7 DE Admin. Code 1130 (Title V) State Operating Permit Condition 3.3.2.1	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

Part C IDENTIFICATION OF DEVIATIONS

1. Do you have any deviations that you are reporting? If YES, complete Part C - Identification of Deviations - Table 2. If NO, complete Part D, if applicable; Part E, and Part F. Reference 7 DE Admin. Code 1130 Section 6.1.3.3.2 and Section 6.1.3.3.4 dated 12/11/00 and the 7 DE Admin. Code 1130 (Title V) State Operating Permit Condition 3.3.2.2	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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7 DE Admin. Code 1130 (Title V) State Operating Permit Program Division of Air Quality SEMI-ANNUAL REPORT		AQM-1001DD
Part D ADDITIONAL INFORMATION		
1. Does the Company possess any additional information that demonstrates compliance and/or non-compliance with any applicable requirement contained in the issued Title V permit? If YES, complete Table 3 – Additional Information Reference Condition No. 3.3.2.3		
2. Is the Company submitting any attachments with the Semi-Annual Report? If YES, please identify all attachments. If additional space is needed, please use Table 4 of this Form		
Part E CERTIFICATION BY RESPONSIBLE OFFICIAL		
I, the undersigned, hereby certify under penalty of law that I am a Responsible Official and that I have personally examined and am familiar with the information submitted in this document and all of its attachments as to truth, accuracy, and completeness of information. I certify based on information and belief formed after reasonable inquiry the statements and information in this document are true, accurate, and complete. By signing this form, I certify that I have not changed, altered, or deleted any portions of this form.		
Responsible Official Signature: _____ Responsible Official Name: Edward G. Human Phone Number: 610-859-1912 Responsible Official Title: Senior Director - Marcus Hook Operations		
Part F SUBMITTAL INFORMATION		
1. The Semi-Annual Report is due February 1 and August 1 of each calendar year. 2. The Semi-Annual Report shall be submitted to the following locations:		
Submit One (1) Original and One (1) Copy: State of Delaware – DNREC Division of Air Quality 100 W. Water Street, Suite 6A Dover, DE 19904 Attn: Director	Submit One (1) Copy: United States Environmental Protection Agency Associate Director of Enforcement (3AP20) 1650 Arch Street Philadelphia, PA 19103	
Reference 7 DE Admin. Code 1130 (Title V) State Operating Permit Condition 2.1.3 and 3.3.3.1 and 7 DE Admin. Code 1130 Sections 6.3.5.1 and 6.3.5.4 dated 12/11/00.		

7 DE Admin. Code 1130 (Title V) State Operating Permit Program
Division of Air Quality
Semi-Annual Report (continued)

AQM-1001DD

Facility Name: Marcus Hook Industrial Complex

Operating Permit Number: AQM-003/00021
06/30/2021

Reporting Period: 01/01/2021 TO

Table 1 – Report of Any Required Monitoring

COLUMN A	COLUMN B	COLUMN C	COLUMN D	
Emission Unit/Point	Applicable Requirement Emission Limitation, Standard, Work Practice Standard or Other Requirement for which monitoring is used to assure compliance	Monitoring	Separate Monitoring Report Required?	If Yes, Date of Separate Report Submittal or Attachment ID
EU 09	<p>1. Fugitive Emission Testing</p> <p>i. Emission Standard:</p> <p>A. The Company shall monitor the following equipment in the ethylene plant for leaks according to the provisions of this section:</p> <p>1. Compressors.</p> <p>2. Pumps in light liquid service.</p> <p>3. Valves in light liquid service.</p> <p>4. Valves in gas/vapor service.</p> <p>5. Pressure relief valves in gas/vapor service.</p> <p>[Reference: Regulation 24, Section 40, dated 1/1/93]</p> <p>B. These requirements do not apply to:</p> <p>1. Any equipment in vacuum service.</p> <p>2. Any pressure-relief valve that is connected to an operating flare header or vapor recovery device.</p> <p>3. Any liquid pump that has a dual mechanical pump seal with a barrier fluid system.</p> <p>4. Any compressor with a degassing vent that is routed to an operating VOC control device.</p> <p>[Reference: Regulation 24, Section 40(a)(3), dated 1/1/93]</p> <p>ii. Operational Limitations:</p> <p>The Company shall ensure that:</p> <p>A. Any open-ended line or valve is sealed with a second valve, blind flange, cap, or plug except during</p>	<p>iii. Compliance Method:</p> <p>Compliance shall be demonstrated in accordance with the monitoring/testing, and recordkeeping requirements of this condition. [Reference: Regulation 30, Section 6(a)(3), dated 11/15/93]</p> <p>iv. Monitoring/Testing:</p> <p>A. Equipment inspection program.</p> <p>1. The Company shall conduct quarterly monitoring of each:</p> <p>a. Compressor.</p> <p>b. Pump in light liquid service.</p> <p>c. Valve in light liquid service.</p> <p>d. Valve in gas/vapor service.</p> <p>e. Pressure relief valve in gas/vapor service.</p> <p>2. The Company shall conduct a weekly visual</p>	YES	7/6/2021

	<p>operations requiring process fluid flow through the open-ended line or valve.</p> <p>B. When a second valve is used, each open-ended line or valve equipped with a second valve is operated in such a manner that the valve on the process fluid end is closed before the second valve is closed.</p> <p>C. When a double block-and-bleed system is used, the bleed valve or line is open only during operations that require venting of the line between the block valves and is closed at all other times.</p> <p>[Reference: Regulation 24, Section 40(c), dated 1/1/93]</p>	<p>inspection of each pump in light liquid service.</p> <p>3. The Company shall monitor each pressure relief valve after each overpressure relief to ensure that the valve has properly reseated and is not leaking. [Note exemption given in paragraph (i)(B)(2) of this section.]</p> <p>4. Leak Standards:</p> <p>a. When an instrument reading of 10,000 parts per million (ppm) or greater is measured, it shall be determined that a leak has been detected.</p> <p>b. If there are indications of liquid dripping from the equipment, it shall be determined that a leak has been detected.</p> <p>5. When a leak is detected, the Company shall affix a weatherproof, readily visible tag in a bright color such as red or yellow bearing the equipment identification number and the date on which the leak was detected. This tag shall remain in place until the leaking equipment is repaired. The requirements of this paragraph apply to any leak detected by the equipment inspection program and to any leak from any equipment that is detected on the basis of sight, sound, or smell.</p> <p>[Reference: Regulation 24, Section 40(d), dated 1/1/93]</p>	
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B. Alternative standards for valves - Skip period leak detection and repair.

1. If the percent of valves leaking is equal to or less than 2.0 for two consecutive quarters, the Company may skip alternate quarterly leak detection periods for the valves in gas/vapor and light liquid service.
2. If the percent of valves leaking is equal to or less than 2.0 for five consecutive quarters, the Company may skip three of the quarterly leak detection periods per year for the valves in gas/vapor and light liquid service, provided that each valve shall be monitored once each year.
3. If at any time the percent of valves leaking is greater than 2.0, the Company shall resume compliance with the requirements in paragraph (A) of this section.
4. The percent of valves leaking shall be determined by dividing the sum of valves found leaking during current monitoring and previously leaking valves for which repair has been delayed by the total number of valves subject to the requirements of this Section. [Reference: Regulation 24, Section 40(e), dated 1/1/93]

C. Alternative standards for unsafe-to-monitor and difficult-to-monitor valves.

1. Any valve is exempt from the requirements of

1. If the percent of valves leaking is equal or less than 2.0, for two consecutive quarters, the Company may skip alternate quarterly leak detection periods for the valves in gas/vapor and light liquid service.
2. If the percent of valves leaking is equal to or less than 2.0 for five consecutive quarters, the Company may skip three of the quarterly leak detection periods per year for the valves in gas/vapor and light liquid service, provided that each valve shall be monitored once each year.
3. If at any time the percent of valves leaking is greater than 2.0, the Company shall resume compliance with the requirements in paragraph (A) of this section.
4. The percent of valves leaking shall be determined by dividing the sum of valves found leaking during current monitoring and previously leaking valves for which repair has been delayed by the total number of valves subject to the requirements of this Section. [Reference: Regulation 24, Section 40(e), dated 1/1/93]
- C. Alternative standards for unsafe-to-monitor and difficult-to-monitor valves.
1. Any valve is exempt from the requirements of

paragraph (A) of this section as an unsafe-to-monitor valve if:

a. The Company

demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger.

b. The Company adheres

to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times.

2. Any valve is exempt

from the requirements of paragraph (A) as a difficult-to-monitor valve if:

a. The Company

demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters (m) (6.6 feet [ft]) above a support surface.

b. The Company follows a

written plan that requires monitoring of the valve at least once per calendar year.

3. The alternative

standards of paragraph (B) of this section are not available to valves subject to this alternative standard.

[Reference: Regulation 24, Section 40(f), dated 1/1/93]

D. Equipment repair

program. The Company shall:

1. Make a first attempt at

repair for any leak not later than 5 calendar days after the leak is detected.

2. Repair any leak as soon

as practicable, but not later than

		<p>15 calendar days after it is detected except as provided in paragraph (E) of this Section. [Reference: Regulation 24, Section 40(g), dated 1/1/93]</p> <p>E. Delay of repair.</p> <p>1. Delay of repair of equipment for which a leak has been detected is allowed if repair is technically infeasible without a process unit shutdown. Repair of such equipment shall occur before the end of the first process unit shutdown after the leak is detected.</p> <p>2. Delay of repair of equipment is also allowed for equipment that is isolated from the process and that does not remain in VOC service after the leak is detected.</p> <p>3. Delay of repair beyond a process unit shutdown is allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, and if valve assembly supplies have been depleted, where valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the first process unit shutdown is not allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.</p> <p>[Reference: Regulation 24, Section 40(h), dated 1/1/93]</p> <p>F. Test methods and procedures.</p>	
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			<p>1. In conducting the monitoring required to comply with this Section, the Company shall use the test methods specified in Appendix "F" of Regulation No. 24.</p> <p>2. The Company shall demonstrate that a piece of equipment is in light liquid service by showing that all of the following conditions apply:</p> <p>a. The vapor pressure of one or more of the components is greater than 0.3 kPa (0.044 in. Hg) at 20 degrees Celsius (68 degrees Fahrenheit) standard reference texts or ASTM D2879 shall be used to determine the vapor pressures.</p> <p>b. The total concentration of the pure components having a vapor pressure greater than 0.3 kPa (0.044 in. Hg) at 20 degrees Celsius (68 degrees Fahrenheit) is equal to or greater than 20 percent by weight.</p> <p>c. The fluid is a liquid at operating conditions.</p> <p>3. Samples used in conjunction with paragraphs (F)(2) and (F)(3) of this Section shall be representative of the process fluid that is contained in or contacts the equipment. [Reference: Regulation 24, Section 40(i), dated 1/1/93]</p> <p>v. Recordkeeping:</p> <p>A. When each leak is detected the following information shall be recorded in a log and shall be kept for 5</p>		
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<p>years in a readily accessible location:</p> <ol style="list-style-type: none"> 1. The instrument and operator identification numbers and the equipment identification number. 2. The date the leak was detected and the dates of each attempt to repair the leak. 3. The repair methods employed in each attempt to repair the leak. 4. The notation "Above 10,000" if the maximum instrument reading after each repair attempt is equal to or greater than 10,000 ppm. 5. The notation "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after the leak is discovered. 6. The signature of the Company official (or designate) whose decision it was that repair could not be effected without a process shutdown. 7. The expected date of successful repair of the leak if a leak is not repaired within 15 days. 8. The dates of process unit shutdowns that occur while the equipment is unrepaired. 9. The date of successful repair of the leak. B. A list of identification numbers of equipment in vacuum service shall be recorded in a log that is kept in a readily accessible location. C. The following information for valves complying 	
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		<p>with paragraph (iv)(B) of this Section shall be recorded in a log that is kept for 5 years in a readily accessible location:</p> <ol style="list-style-type: none"> 1. A schedule of monitoring. 2. The percent of valves found leaking during each monitoring period. D. The following information pertaining to all valves subject to the requirements of paragraph (iii)(C) of this Section shall be recorded in a log that is kept for 5 years in a readily accessible location: <ol style="list-style-type: none"> 1. A list of identification numbers for valves that are designated as unsafe to monitor, an explanation for each valve stating why the valve is unsafe to monitor, and the plan for monitoring each valve. 2. A list of identification numbers for valves that are designated as difficult to monitor, an explanation for each valve stating why the valve is difficult to monitor, and the schedule for monitoring each valve. <p>[Reference: Regulation 24, Section 40(j), dated 1/1/93]</p>		
EU 22	<p>1. Pumps in Light Liquid Service</p> <ol style="list-style-type: none"> i. Operational Standards: <p>A. Each pump in light liquid service shall be monitored by the methods and procedures given in section (iii)(A) of this unit. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-2(a), dated 12/14/00]</p> <p>B. Leak Repair:</p> 	<p>ii. Compliance Method: <p>Compliance with the operational standards of this condition shall be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> </p>	YES	07/6/2021

<p>1. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Section 8 of this unit. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-2(b)(1), dated 12/14/00]</p> <p>2. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-2(b)(1), dated 12/14/00]</p> <p>C. Each pump equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of paragraph (A) of this section, provided the following requirements are met:</p> <ol style="list-style-type: none"> 1. Each dual mechanical seal system is- <ol style="list-style-type: none"> a. Operated with the barrier fluid at a pressure that is at all times greater than the pump stuffing box pressure; or b. Equipment with a barrier fluid degassing reservoir that is connected by a closed vent system to a control device that complies with the requirements of Section 9 of this unit; or, c. Equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere. 2. The barrier fluid system is in heavy liquid service or is not in VOC service. 3. Each barrier fluid system is equipped with a sensor that will detect failure of the seal system, the barrier fluid system, or both. 4. Each pump is checked by visual inspection, each calendar week, for indications of liquids dripping from the pump seals. 5. <ol style="list-style-type: none"> a. Each sensor as described in paragraph (3) of this section is checked daily or is equipped with an audible alarm, and b. The Company determines, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. 6. <ol style="list-style-type: none"> a. If there are indications of liquids dripping from the pump seal or the sensor indicates 	<p>iii. Monitoring/Testing:</p> <p>A. Periodic Monitoring:</p> <ol style="list-style-type: none"> 1. Each pump in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60, Subpart VV, §60.485(b), dated 7/1/00, except as given in paragraphs (i)(C), (i)(D), and (i)(E) of this section. 2. Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-2(a), dated 12/14/00]</p> <p>B. Detection of Leaks:</p> <ol style="list-style-type: none"> 1. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. 2. If there are indications of liquids dripping from the pump seal, a leak is detected. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-2(b), dated 12/14/00]</p> <p>iv. Recordkeeping:</p> <p>None in addition to the requirements of Section 12 of this unit.</p>	
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	<p>failure of the seal system, the barrier fluid system, or both based on the criterion determined in paragraph (C)(5)(b), a leak is detected.</p> <p>b. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Section 9 of this unit</p> <p>c. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-2(d), dated 12/14/00]</p> <p>D. Any pump that is designated for no detectable emission, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of paragraphs (i)(A), (i)(B) and (i)(C) of this section and Section (iii) of this unit if the pump:</p> <ol style="list-style-type: none"> Has no externally actuated shaft penetrating the pump housing, Is demonstrated to be operating with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background as measured by the methods specified in 40 CFR 60, Subpart VV, §60.485(c), dated 7/1/00, and Is tested for compliance with paragraph (D)(2) initially upon designation, annually, and at other times requested by the Department. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-2(e), dated 12/14/00] <p>E. If any pump is equipped with a closed vent system capable of capturing and transporting any leakage from the seal or seals to a control device that complies with the requirements of Section 9 of this unit, it is exempt from this section. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-2(f), dated 12/14/00]</p>			
EU 22	<p>3. Pressure relief devices in gas/vapor service.</p> <p>i. Operational Standards:</p> <p>A. Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as</p>	<p>i. Compliance Method: Compliance with the operational standards of this condition shall be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of</p>	YES	07/6/2021

	<p>determined by the methods specified in 40 CFR 60, Subpart VV, §60.485(c), dated 7/1/00. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-4(a), dated 12/14/00]</p> <p>B. Any pressure relief device that is equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in Section 9 of this unit is exempted from the requirements of paragraphs (i)(A) and (iii) of this section. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-4(c), dated 12/14/00]</p>	<p>this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing:</p> <p>A. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in Section 8 of this unit. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-4(b)(1), dated 12/14/00]</p> <p>B. No later than 5 calendar days after a pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, by the methods specified in 40 CFR 60, Subpart VV, §60.485(c), dated 7/1/00. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-4(b)(2), dated 12/14/00]</p> <p>iv. Recordkeeping: None in addition to the requirements of Section 12 of this unit.</p>	
ii.	Compliance Method:		

		<p>Compliance with the operational standards of this condition shall be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing: None.</p> <p>iv. Recordkeeping: None in addition to the requirements of Section 12 of this unit.</p>		
EU 22	<p>6. Valves in gas/vapor service and in light liquid service.</p> <p>i. Operational Standards:</p> <p>A. Each valve shall be monitored as given in section (iii) of this unit and shall comply with paragraphs (B) through (D), except as provided in paragraphs (E) and (F) and Sections 10 and 11 of this unit. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(a), dated 7/1/00]</p> <p>B. 1. When a leak is detected, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in Section 8 of this unit.</p> <p>2. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(d), dated 7/1/00]</p> <p>C. First attempts at repair include, but are not limited to, the following best practices where practicable:</p> <ol style="list-style-type: none"> 1. Tightening of bonnet bolts; 2. Replacement of bonnet bolts; 3. Tightening of packing gland nuts; 4. Injection of lubricant into lubricated packing. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(e), dated 7/1/00]</p>	<p>ii. Compliance Method:</p> <p>Compliance with the operational standards of this condition shall be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing: None.</p> <p>A. Each valve shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60, Subpart VV, §60.485(b), dated 7/1/00. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(a), dated 7/1/00]</p> <p>B. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(b), dated 7/1/00]</p> <p>C. 1. Any valve for which a leak is not detected for 2 successive months may be</p>	YES	07/06/2021

	<p>D. Any valve that is designated for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of paragraph (A) of this section if the valve:</p> <ol style="list-style-type: none"> 1. Has no external actuating mechanism in contact with the process fluid, 2. Is operated with emissions less than 500 ppm above background as determined by the method specified in 40 CFR 60, Subpart VV, §60.485(c), dated 7/1/00, and 3. Is tested for compliance with paragraph (D)(2) initially upon designation, annually, and at other times requested by the Department. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(f), dated 7/1/00]</p> <p>E. Any valve that is designated as an unsafe-to-monitor valve is exempt from the requirements of paragraph (A) if:</p> <ol style="list-style-type: none"> 1. The Company of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with paragraph (A), and 2. The Company of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(g), dated 7/1/00]</p> <p>F. Any valve that is designated as a difficult-to-monitor valve is exempt from the requirements of paragraph (A) if:</p> <ol style="list-style-type: none"> 1. The Company of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface. 2. The Company designates less than 3.0 percent of the total number of valves as difficult-to-monitor, and 3. The Company follows a written plan that requires monitoring of the valve at least once per calendar year. 	<p>monitored the first month of every quarter, beginning with the next quarter, until a leak is detected.</p> <ol style="list-style-type: none"> 2. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(c), dated 7/1/00]</p> <p>iv. Recordkeeping: None in addition to the requirements of Section 12 of this unit.</p>	
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	<p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-7(h), dated 7/1/00]</p>		
EU 22	<p>7. Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors.</p> <p>i. Operational Standards:</p> <p>A. Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors shall be monitored according to the timing and methods given in section (iii) of this unit. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-8(a), dated 12/14/00]</p> <p>B. 1. When a leak is detected, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in Section 8 of this unit.</p> <p>2. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-8(c), dated 12/14/00]</p> <p>C. First attempts at repair include, but are not limited to, the best practices described under Section 6(i)(C) of this unit. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-8(d), dated 12/14/00]</p>	<p>ii. Compliance Method:</p> <p>Compliance with the operational standards of this condition shall be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing:</p> <p>A. Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors shall be monitored within 5 days by the method specified in 40 CFR 60, Subpart VV, §60.485(c), dated 7/1/00 if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-8(a), dated 12/14/00]</p> <p>B. If an instrument reading of 10,000 ppm or greater is measured, a leak is detected. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-8(b), dated 12/14/00]</p> <p>iv. Recordkeeping: None in addition to the requirements of Section 12 of this unit.</p>	<p>YES</p> <p>07/06/2021</p>
EU 22	<p>8. Delay of repair.</p> <p>i. Operational Standard:</p>	<p>ii. Compliance Method:</p> <p>Compliance with the operational standards of this condition shall</p>	<p>YES</p> <p>07/06/2021</p>

<p>A. Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-9(a), dated 12/14/00]</p> <p>B. Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-9(b), dated 12/14/00]</p> <p>C. Delay of repair for valves will be allowed if:</p> <ol style="list-style-type: none"> 1. The Company demonstrates that emissions of purged material resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and 2. When repair procedures are effected, the purged material is collected and destroyed or recovered in a control device complying with Section 9 of this unit. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-9(c), dated 12/14/00] <p>D. Delay of repair for pumps will be allowed if:</p> <ol style="list-style-type: none"> 1. Repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and 2. Repair is completed as soon as practicable, but not later than 6 months after the leak was detected. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-9(d), dated 12/14/00] <p>E. Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.482-9(e), dated 12/14/00]</p>	<p>be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <ol style="list-style-type: none"> iii. Monitoring/Testing: None. iv. Recordkeeping: None in addition to the requirements of Section 12 of this unit. 	
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EU 22	<p>12. i. Recordkeeping requirements.</p> <p>The Company shall comply with the recordkeeping requirements of this section. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(a), dated 12/14/00]</p>	<p>ii. Compliance Method: Compliance with this section will be accomplished by maintaining the records required by section (iv).</p> <p>iii. Monitoring/Testing: None in addition to the requirements of the other sections of this unit.</p> <p>iv. Recordkeeping:</p> <p>A. When each leak is detected, as specified in Sections 1, 2, 6, 7, and 11 of this unit, the following requirements apply:</p> <p>1. A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment.</p> <p>2. The identification on a valve may be removed after it has been monitored for 2 successive months and no leak has been detected during those 2 months.</p> <p>3. The identification on equipment, except for a valve, may be removed after it has been repaired.</p> <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(b), dated 12/14/00]</p> <p>B. When each leak is detected, as specified in Sections 1, 2, 6, 7 and 11 of this unit, the following information shall be recorded in a log and shall be kept for 5 years in a readily accessible location:</p>	YES	07/06/2021
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		<ol style="list-style-type: none"> 1. The instrument and operator identification numbers and the equipment identification number. 2. The date the leak was detected and the dates of each attempt to repair the leak. 3. Repair methods applied in each attempt to repair the leak. 4. "Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 60, Subpart VV, §60.485(a), dated 7/1/00 after each repair attempt is equal to or greater than 10,000 ppm. 5. "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak. 6. The signature of the Company (or designate) whose decision it was that repair could not be effected without a process shutdown. 7. The expected date of successful repair of the leak if a leak is not repaired within 15 days. 8. Dates of process unit shutdowns that occur while the equipment is unrepaired. 9. The date of successful repair of the leak. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(c), dated 12/14/00]</p> <p>C. The following information pertaining to the</p>		
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		<p>design requirements for closed vent systems and control devices described in Section 9 of this unit shall be recorded and kept in a readily accessible location:</p> <ol style="list-style-type: none">1. Detailed schematics, design specifications, and piping and instrumentation diagrams.2. The dates and descriptions of any changes in the design specifications.3. A description of the parameter or parameters monitored, as required in 40 CFR 60, Subpart VV, §60.482_10(e), dated 12/14/00, to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring.4. Periods when the closed vent systems and control devices required in Sections 1-4 of this unit are not operated as designed, including periods when a flare pilot light does not have a flame.5. Dates of startups and shutdowns of the closed vent systems and control devices required in Sections 1-4 of this unit. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(d), dated 12/14/00]</p> <p>D. The following information pertaining to all equipment subject to the requirements in Sections 1-9 of</p>	
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	<p>this unit shall be recorded in a log that is kept in a readily accessible location:</p> <ol style="list-style-type: none">1. A list of identification numbers for equipment subject to the requirements of this subpart.2. A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of Sections 1(i)(D), 2(i)(F) and 6(i)(D) of this unit.3. The designation of equipment as subject to the requirements of Sections 1(i)(D), 2(i)(F) and 6(i)(D) of this unit shall be signed.4. A list of equipment identification numbers for pressure relief devices required to comply with Section 3 of this unit.5. The dates of each compliance test as required in Sections 1(i)(D), 2(i)(F), 3, and 6(i)(D) of this unit.6. The background level measured during each compliance test.7. The maximum instrument reading measured at the equipment during each compliance test.8. A list of identification numbers for equipment in vacuum service. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(e), dated 12/14/00]</p>
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| | <p>this unit shall be recorded in a log that is kept in a readily accessible location:</p> <ol style="list-style-type: none">1. A list of identification numbers for equipment subject to the requirements of this subpart.2. A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of Sections 1(i)(D), 2(i)(F) and 6(i)(D) of this unit.3. The designation of equipment as subject to the requirements of Sections 1(i)(D), 2(i)(F) and 6(i)(D) of this unit shall be signed.4. A list of equipment identification numbers for pressure relief devices required to comply with Section 3 of this unit.5. The dates of each compliance test as required in Sections 1(i)(D), 2(i)(F), 3, and 6(i)(D) of this unit.6. The background level measured during each compliance test.7. The maximum instrument reading measured at the equipment during each compliance test.8. A list of identification numbers for equipment in vacuum service. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(e), dated 12/14/00]</p> |
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	<p>this unit shall be recorded in a log that is kept in a readily accessible location:</p> <ol style="list-style-type: none">1. A list of identification numbers for equipment subject to the requirements of this subpart.2. A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of Sections 1(i)(D), 2(i)(F) and 6(i)(D) of this unit.3. The designation of equipment as subject to the requirements of Sections 1(i)(D), 2(i)(F) and 6(i)(D) of this unit shall be signed.4. A list of equipment identification numbers for pressure relief devices required to comply with Section 3 of this unit.5. The dates of each compliance test as required in Sections 1(i)(D), 2(i)(F), 3, and 6(i)(D) of this unit.6. The background level measured during each compliance test.7. The maximum instrument reading measured at the equipment during each compliance test.8. A list of identification numbers for equipment in vacuum service. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(e), dated 12/14/00]</p>
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	<p>this unit shall be recorded in a log that is kept in a readily accessible location:</p> <ol style="list-style-type: none">1. A list of identification numbers for equipment subject to the requirements of this subpart.2. A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of Sections 1(i)(D), 2(i)(F) and 6(i)(D) of this unit.3. The designation of equipment as subject to the requirements of Sections 1(i)(D), 2(i)(F) and 6(i)(D) of this unit shall be signed.4. A list of equipment identification numbers for pressure relief devices required to comply with Section 3 of this unit.5. The dates of each compliance test as required in Sections 1(i)(D), 2(i)(F), 3, and 6(i)(D) of this unit.6. The background level measured during each compliance test.7. The maximum instrument reading measured at the equipment during each compliance test.8. A list of identification numbers for equipment in vacuum service. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(e), dated 12/14/00]</p>
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			<p>E. The following information pertaining to all valves subject to the requirements of Section 6(i)(E) and (F) of this unit shall be recorded in a log that is kept in a readily accessible location:</p> <ol style="list-style-type: none"> 1. A list of identification numbers for valves that are designated as unsafe-to-monitor, an explanation for each valve stating why the valve is unsafe-to-monitor, and the plan for monitoring each valve. 2. A list of identification numbers for valves that are designated as difficult-to-monitor, an explanation for each valve stating why the valve is difficult-to-monitor, and the schedule for monitoring each valve. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(f), dated 12/14/00]</p> <p>F. The following information shall be recorded for valves complying with Section 1 of this unit:</p> <ol style="list-style-type: none"> 1. A schedule of monitoring. 2. The percent of valves found leaking during each monitoring period. <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(g), dated 12/14/00]</p> <p>G. The following information shall be recorded in a log that is kept in a readily accessible location:</p>	
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		<p>1. Design criterion required in Sections 1(i)(C)(5) and 2(iii)(B)(2) of this unit and explanation of the design criterion; and</p> <p>2. Any changes to this criterion and the reasons for the changes.</p> <p>[Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(h), dated 12/14/00]</p> <p>H. Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [Reference: Regulation No. 24, Section 28, dated 11/29/94 and 40 CFR 60, Subpart VV, §60.486(j), dated 12/14/00]</p>	
EU 22	<p>14. Reporting requirements.</p> <p>i. Standards: (v).</p> <p>The Company shall submit reports as given in section (v).</p>	<p>ii. Compliance Method: Compliance with the operational standards of this condition shall be demonstrated in accordance with the reporting requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing: None.</p> <p>iv. Recordkeeping: None in addition to the requirements of Section 12 of this unit.</p>	<p>YES</p> <p>07/06/2021</p>
EU 23	<p>1. Visible Emissions.</p> <p>i. Emission Standard: The Company shall not cause or allow the emission of visible air contaminants and/or smoke from any emission unit, the shade or appearance of which is greater than twenty (20) percent opacity for an aggregate of more than three (3) minutes in any one</p>	<p>ii. Compliance Method: Compliance with the emission standard of this condition shall be demonstrated in accordance with Regulation No. 20, §1.5(c) and the recordkeeping requirements. [Reference:</p>	<p>NO</p>

(1) hour or more than fifteen (15) minutes in any twenty-four (24) hour period. [Reference: Regulation No. 14 Section 2.1 dated 7/17/84 and Permits APC-82/0586, dated 9/26/83, APC-82/0587, dated 9/26/83, APC-82/0588, dated 7/18/83, APC-83/0035, dated 3/22/96 and APC-89/0049, dated 12/2/88]	Regulation No. 14 Section 4.1 dated 7/17/84 and Regulation No. 30 Section 6(a)(3) dated 11/15/93]
iii. Monitoring - [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]: A. The Company shall for each emission point associated with the following emission units conduct a survey during daylight hours when the emission unit is in operation to detect the presence or absence of visible emissions at the frequency specified in the following table:	
Frequency Emission Unit No.	
Daily EU-01 (BG-1, BG-2, BG-3) [all days burning #6 Fuel Oil]	
Monthly EU-01 (BG-1, BG-2, BG-3) [months when burning only natural gas or "methane-rich" gas], EU-02 (W1), EU-03 (C1-C4) EU-04 (H1 & H2) No Frequency Specified All other units [When visible emissions are observed] Insignificant Activities	
Alternatively, the Company may conduct visible emissions testing in accordance with paragraph iv(B) of this section.	

		<p>B. The Company shall take immediate corrective actions upon detection of the presence of visible emissions which may include but not be limited to shut down, maintenance, and/or verification of visible emissions per the methodology of paragraph iv(B) of this section by a certified smoke reader. The Company shall re-evaluate the emission point for visible emissions after corrective actions have been taken. This re-evaluation shall take place within 24 hours for those sources subject to daily monitoring and within two days for all other sources. The presence of visible emissions during the re-evaluation shall be cause for corrective action in terms of maintenance or conducting visible emissions testing per paragraph iv(B) of this section to verify compliance or noncompliance. [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>C. Visible emissions testing utilizing the procedure in Paragraph iv(B) of this Section (Method 9) shall be conducted a minimum of once each calendar quarter for emission units BG-1, BG-2 and BG-3 while the emission units are in operation and by a certified smoke reader. [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>iv. Testing:</p>	
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		<p>A. 1. "Survey of emission point for the presence or absence of visible emissions" shall be defined as a period of twenty (20) consecutive minutes. The survey of emission units concurrently is acceptable provided all emission points are easily observable from the observer's position. [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>2. The detection of the presence or absence of visible emissions shall be in accordance with the procedures of EPA Reference: Method 22 paragraphs 4 and 5. [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>3. If emissions are observed for three (3) consecutive minutes, the observation may be stopped and corrective actions or visible emissions testing per paragraph iv(B) of this section. [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>4. This procedure does not require that the opacity of the emissions be determined. Since this procedure requires only the determination of whether a visible emission occurs and does not require the determination of opacity levels, observer certification according to the procedures of EPA Reference: Method 9 are not required.</p>		
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			<p>However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor). This training can be obtained from the lecture portion of the EPA Reference: Method 9 certification course. [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>B. Conduct visual observations at fifteen second intervals for a period of not less than one hour except that the observations may be discontinued whenever a violation of the standard is recorded. The additional procedures, qualification and testing to be used for visually determining the opacity shall be those specified in Section 2 and 3 (except for Section 2.5 and the second sentence of Section 2.4) of reference Method 9 set forth in Appendix A, 40 CFR Part 60, dated 7/1/00. [Reference: Regulation No. 20 Section 1.5(c)(1), dated 12/7/88]</p> <p>V. Recordkeeping - [Reference: Regulation No. 30</p>		
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		<p>Section 6(a)(3)(i)(B), dated 11/15/93]:</p> <p>The Company shall maintain the following records on site and made available to the Department upon request:</p> <p>A. Observation records shall be maintained.</p> <p>B. Records of all routine and non-routine maintenance and corrective actions.</p> <p>C. Records of personnel and/or contractor certification per the requirements of EPA Reference Method 9.</p> <p>D. Records of personnel and/or contractor training.</p> <p>E. Records of production or operating data corresponding to each emission unit.</p>		
<p>EU 23</p>	<p>No person shall cause or allow the emission of an odorous air contaminant such as to cause a condition of air pollution. [Reference: Regulation No. 19, Section 2.1, dated 2/1/81]</p> <p>2. Odor.</p> <p>i. Emission Standard:</p>	<p>ii. Compliance Method:</p> <p>Compliance with the emission standard of this condition shall be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing:</p> <p>A. The Company shall monitor for the presence of unusual odor concentrations beyond the plant property on a weekly basis. Upon detection of such odor the plant personnel will investigate to determine the cause and take appropriate corrective action. [Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>B. Upon receipt of any complaint from the community</p>	NO	

		<p>or the DNREC regarding a potential odor from the plant, a plant representative shall investigate to determine the cause and take appropriate corrective action. [Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>C. Tests include but are not limited to scentometer tests, air quality monitoring, and affidavits from affected citizens and investigators. [Reference Regulation No. 19 Section 1.2 dated 2/1/81]</p> <p>iv. Recordkeeping:</p> <p>A. Records of all monitoring/testing shall be maintained on site. [Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>B. Records of all odor complaints received at the facility and corresponding corrective action. [Reference Regulation</p>		
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7 DE Admin. Code 1130 (Title V) State Operating Permit Program
Division of Air Quality
Semi-Annual Report (continued)

AQM-1001DD

Facility Name: Marcus Hook Industrial Complex

Operating Permit Number: AQM-003/00021
06/30/2021

Reporting Period: 01/01/2021 TO

Table 2 – Identification of Deviations

1. Permit Term or Condition for which there is a deviation	2. Emission Unit Identification	3. Deviation Description
No deviations to report		
4. Deviation Duration		
4.1 Date (mm/dd/yyyy) Beginning: / / Ending: / /	4.2 Time (hr:min) Start: : End: :	4.3 Duration (hr:min): :
5. Probable Cause of Deviation	6. Corrective Action	
7. Deviation Reporting		
7.1 Did your Permit require that this Deviation be reported previously? <input type="checkbox"/> YES <input type="checkbox"/> NO		
7.2 Was this Deviation reported previously? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NOT APPLICABLE		
7.2(a) If YES, provide the date the written report was submitted: / /		

AQM-1001DD

Reporting Period: 01/01/2021 TO

Additional Information

[illegible]

AQM-1001DD

Reporting Period: 01/01/2021 TO

Table 4 – Additional Information – List of Attachments

[illegible]

ATTACHMENT 1

7 DE Admin. Code 1130 (Title V) State Operating Permit Program
Division of Air Quality
Semi-Annual Report (continued)

AQM-1001DD

Facility Name: Marcus Hook Industrial Complex

Operating Permit Number: AQM-003/00021
06/30/2021

Reporting Period: 01/01/2021 TO

Table 1 – Report of Any Required Monitoring

COLUMN A	COLUMN B	COLUMN C	COLUMN D
Emission Unit/Point	Applicable Requirement Emission Limitation, Standard, Work Practice Standard or Other Requirement for which monitoring is used to assure compliance	Monitoring	Separate Monitoring Report Required?
EU 23	<p>3. Handling, Storage and Disposal of VOCs.</p> <p>i. Work Practice Standards:</p> <p>A. The Company shall not cause, allow, or permit the disposal of more than eleven (11) pounds of a Volatile Organic Compound (VOC), or of any materials containing more than eleven (11) pounds of any VOCs, in any one (1) day, in a manner that would permit the evaporation of VOC into the ambient air. This includes but is not limited to the disposal of VOC from any VOC control devices. This provision does not apply to:</p> <p>1. Any VOC or material containing VOC emitted from a regulated entity that is subject to a VOC standard under Regulation No. 24.</p> <p>2. Any VOC or material containing VOCs used during process maintenance turnarounds for cleaning purposes, provided that the provisions of paragraph (B), (C), and (D) of this condition are followed.</p> <p>3. Waste paint (sludge) handling systems, water treatment systems, and other similar operations at coating facilities using complying coatings.</p> <p>B. No owner or operator of a facility subject to this regulation shall use open containers for the storage or disposal of cloth or paper impregnated with VOCs that are used for surface preparation, cleanup, or coating removal. Containers for the storage or disposal of cloth or paper impregnated with VOCs shall be kept closed, except when adding or removing material.</p>	<p>ii. Compliance Method: demonstrated by adherence with the VOC handling work practices by providing appropriate training and posting of instructions, and record keeping for storage, use and disposal of VOCs. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing: Monitor work practice standards and employee training records on a monthly basis, update records as needed. [Reference Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p> <p>iv. Recordkeeping: The Company shall keep a record of postings, and employee training related to these work practice standards and handling, storage, and disposal of VOCs. [Reference: Regulation No. 30 Section 6(a)(3)(i)(B) dated 11/15/93]</p>	No

	<p>C. No owner or operator of a facility subject to this regulation shall store in open containers spent or fresh VOC to be used for surface preparation, cleanup or coating removal. Containers for the storage of spent or fresh VOCs shall be kept closed, except when adding or removing material.</p> <p>D. No owner or operator shall use VOC for the cleanup of spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere.</p> <p>[Reference: Regulation No. 24, Section 8, dated 11/29/94]</p>		
EU 23	<p>4. Industrial Cleaning Solvents.</p> <p>i. Applicability:</p> <p>The Company shall uses less than 4,540 kilograms (5 tons) of cleaning solvent per year except for solvent uses associated with the following:</p> <p>A. Solvent degreasers covered by Unit (e) of this Table.</p> <p>B. Any non-manufacturing area cleaning operation.</p> <p>C. Any non-routine maintenance of manufacturing facilities and equipment.</p>	<p>ii. Compliance Method:</p> <p>Compliance with the emission standard of this condition shall be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing:</p> <p>The Company shall monitor purchase and usage of cleaning solvents monthly.</p> <p>iv. Recordkeeping:</p> <p>The Company shall keep inventory records showing monthly purchase, usage and disposal of cleaning solvents.</p>	No
EU 23	<p>5. General Testing Provisions.</p> <p>i. Operational Standard:</p> <p>Upon written request of the Department, an owner or operator of an air contaminant source shall, at his expense, sample the emissions of, or fuel used by, that source, maintain records and submit reports to the Department on the results of such sampling.</p> <p>[Reference: Regulation No. 17, Section 2.2, dated 7/17/84]</p>	<p>ii. Compliance Method:</p> <p>Compliance with the operational standard of this condition shall be demonstrated in accordance with the monitoring/testing, recordkeeping and reporting requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing:</p> <p>A. A test protocol shall be submitted in advance of the test date. The tests shall be conducted in accordance with</p>	No

		<p>the State of Delaware and Federal requirements.</p> <p>B. The test protocol shall be approved and the Department must have the opportunity to observe the test before the results are considered acceptable. Upon approval of the test protocol by the Department, the Company shall schedule the compliance demonstration with the Air Surveillance Branch.</p> <p>C. The owner or operator shall provide the Department with at least thirty (30) calendar days prior notice of any performance test when requesting scheduling.</p> <p>iv. Recordkeeping: The Company shall keep the following test records as a minimum:</p> <p>A. Approved test protocol.</p> <p>B. Raw data.</p> <p>C. Calculations.</p> <p>D. Final report.</p>		
EU 23	<p>6. Inspection and Maintenance:</p> <p>i. Operational Standard: The Company shall maintain and operate all sources, including associated equipment for air pollution control, in a manner consistent with good air pollution control practice for minimizing emissions. [Reference Regulation No. 1 Section 3.2, dated 2/1/81 and Regulation No. 1102, Section 11.6, dated 6/1/97]</p>	<p>ii. Compliance Method: Compliance with the emission standard of this condition shall be demonstrated in accordance with the monitoring/testing and recordkeeping requirements of this section. [Reference Regulation No. 30 Section 6(a)(3) dated 11/15/93]</p> <p>iii. Monitoring/Testing:</p> <p>A. The Company shall inspect each emission unit annually.</p> <p>B. All equipment shall meet vendor specifications and industrial standards.</p> <p>iv. Recordkeeping:</p>	No	

ATTACHMENT 2



**SUNOCO PARTNERS
MARKETING & TERMINALS**
An ENERGY TRANSFER Partnership

Via First Class and Electronic Mail

July 6, 2021

Brad Klotz
State of Delaware – DNREC
Division of Air Quality
100 West Water Street, Suite 6A
Dover, DE 19904

Re: Sunoco Partners Marketing & Terminals L.P. – Marcus Hook Industrial Complex
DE Title V Permit: AQM-003-00021
Semi-Annual Delaware Reg 1124 and 40 CFR 60 Subpart VV Report
1st Half 2021

Dear Mr. Klotz,

Pursuant to DE Title V Permit: AQM-003-00021, Sunoco Partners Marketing & Terminals L.P. hereby submits the required reports for the 1st Half 2021. The attached report identifies:

Number of components monitored.....	241
Number of components found leaking.....	0
Number of components not repaired within five (5) days.....	0
Number of components not repaired within fifteen (15) days and placed on Delay of Repair List (1 st Half 2021).....	0

All monitoring and repairs were performed as stipulated in the monitoring program regulated under this permit.

Please feel free to call me at (610) 859-1279 if you have any questions, comments, or concerns.

Sincerely,

Kevin W. Smith

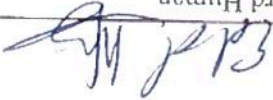
Specialist – Environmental Compliance

Enclosures

Cc: Office of Air Enforcement and Compliance Assistance (3AP20)
United States Environmental Protection Agency Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Certification Statement

"I certify under penalty of law that I have personally examined and am familiar with the information submitted, and that based on my inquiry of those individuals responsible for obtaining the information, I believe that the submitted information is true, accurate and complete."



Edward Human
Senior Director - Marcus Hook Operations
Sunoco Partners Marketing & Terminals L.P.

Date 7/6/2021

Component Monitoring Summary Report
 Marcus Hook Industrial Complex
 1st Half 2021

Unit	Class	Month	Monitored	Leaked	Late Repair	DOR
DOCK 3C	VALVE	2	98	0	0	0
	VALVE	5	98	0	0	0
	RELIEF	5	2	0	0	0
	Totals		198	0	0	0
ME1 - DE	PUMP	1	1	0	0	0
	PUMP	2	1	0	0	0
	PUMP	4	1	0	0	0
	PUMP	5	1	0	0	0
	PUMP	6	1	0	0	0
	VALVE	3	19	0	0	0
	VALVE	6	19	0	0	0
	Totals		43	0	0	0
	Grand Totals		241	0	0	0

